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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

DISABILITY RIGHTS OREGON,  
METROPOLITAN PUBLIC DEFENDERS  
INCORPORATED, and A.J. MADISON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as  
Director of Oregon Health Authority,  
DOLORES MATTEUCCI, in her official  
capacity as Superintendent of the Oregon  
State Hospital,

Defendants,

and

Case No. 3:02-cv-00339-MO (Lead Case)  
Case No. 3:21-cv-01637-MO (Member Case)  
Case No. 6:22-CV-01460-MC (Member Case)

**PLAINTIFFS' UNOPPOSED MOTION  
FOR LEAVE TO FILE BRIEF IN  
EXCESS OF PAGE LIMIT**

**Pursuant to LR 7-2(b)**

4879-6514-6677.1

PLAINTIFFS' UNOPPOSED MOTION  
FOR LEAVE TO FILE BRIEF IN  
EXCESS OF PAGE LIMIT

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LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH, LEGACY  
HEALTH SYSTEM, PEACEHEALTH, and  
PROVIDENCE HEALTH & SERVICES –  
OREGON,

Intervenors.

JAROD BOWMAN, JOSHAWN  
DOUGLAS-SIMPSON,

Plaintiffs,

v.

DOLORES MATTEUCCI, Superintendent of  
the Oregon State Hospital, in her individual  
and official capacity, PATRICK ALLEN,  
Director of the Oregon Health Authority, in  
his individual and official capacity,

Defendants,

and

LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH LEGACY  
HEALTH SYSTEM, PEACEHEALTH, and  
PROVIDENCE HEALTH & SERVICES,

Intervenors.

Case No. 3:21-cv-01637-MO (Member Case)

LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH; LEGACY  
HEALTH SYSTEM; PEACEHEALTH; and  
PROVIDENCE HEALTH & SERVICES  
OREGON,

Plaintiffs,

v.

PATRICK ALLEN, in his official capacity as  
Director of Oregon Health Authority,

Defendant.

Case No. 6:22-CV-01460-MC (Member Case)

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PLAINTIFFS' UNOPPOSED MOTION  
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## I. LOCAL RULE 7-1 CERTIFICATION

Pursuant to LR 7-1(b), Plaintiffs Legacy Emanuel Hospital & Health Center d/b/a Unity Center for Behavioral Health, Legacy Health System, PeaceHealth, and Providence Health & Services – Oregon, and St. Charles Health System (“Plaintiffs”) certify that counsel for Plaintiffs have conferred in good faith with counsel for Defendant regarding the relief requested in this Motion. Defendant does not oppose the motion.

## II. MOTION

Pursuant to Local Rule 7-2(b)<sup>1</sup>, Plaintiffs respectfully move the Court to enlarge the page limit for their Opposition to Defendant’s Motion to Dismiss by seven pages, from 35 to 42 pages. Plaintiffs’ Opposition is due Thursday, January 26, 2023.

Plaintiffs require an additional seven pages to respond thoroughly and sufficiently to each argument raised in Defendant’s Motion to Dismiss. Defendant raises over a dozen general arguments for why this Court should dismiss some or all of Plaintiffs’ claims, and many of those general argument contain multiple sub-arguments. Several arguments could be found by the Court to be dispositive of at least one of Plaintiffs’ claims. Accordingly, Plaintiffs require seven additional pages to be heard sufficiently on each argument and to provide the Court with helpful analysis.

For the foregoing reasons, as well as the fact that this motion is unopposed, Plaintiffs respectfully request that the Court grant leave to exceed the page limit set forth in LR 7-2(b) by seven pages.

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<sup>1</sup> LR 7-2(b) provides that, without prior approval from the Court, memoranda in support of non-discovery motions cannot exceed 11,000 words (exclusive of the caption, table of contents, table of authorities, signature block, exhibits, and certificates of counsel) or, in the alternative, 35 pages.

DATED: January 26, 2023

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INTERVENORS UNOPPOSED  
MOTION FOR LEAVE TO FILE  
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